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January 13, 2017

VIA ECF

Hon. Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

Re: Blair v. Alstom S.A. et al., No. 1:16-cv-03391-PAE

Dear Judge Engelmayer:

We represent the Plaintiff in the above referenced matter. The Plaintiff writes this letter to respectfully request leave to substitute the named corporate entities in the Complaint. At the outset of this action Defendants advised the Plaintiff that the correct defendant corporate entities in connection with Plaintiff's claims are Alstom Transport, Inc. and Kawasaki Rail Car, Inc. (in place of Alstom, S.A. and Kawasaki Heavy Industries, Ltd.) and requested that the Plaintiff make the substitution. Plaintiff agreed that it would revise its complaint after receiving information from Defendants clarifying the matter. Plaintiff recently received information in discovery from the Defendants that appears to confirm Defendant's assertion regarding the appropriate defendant corporate entities to be named.

Accordingly, Plaintiff respectfully request leave from the Court to file a corrected/amended complaint to substitute the named defendant corporate entities as proposed by the Defendants with the substitution relating back to the original filing date of the Complaint. Besides substitution of the names of the identified defendant corporate entities no other changes/edits would be made in the proposed corrected/amended complaint. Plaintiff has conferred with the Defendants and they have no objection to Plaintiff's request to make this substitution. Alternatively, should the Court wish that this matter be addressed in a motion in accordance with Local Civil Rule 7.1(a), Plaintiff shall make the appropriate submission.

Respectfully submitted,

/s/ Darius Keyhani
Darius Keyhani